

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

JANE DOE,	)	
	)	
Plaintiff,	)	Civil Action No. 3: 2023-cv-00477
	)	
v.	)	
	)	
WILLIAMS BOWERS MANAGEMENT,	)	JUDGE CAMPBELL
LLC D/B/A WIDE OPEN MUSIC,	)	MAGISTRATE JUDGE CHIP FRENSLEY
ASH BOWERS, JIMMIE ALLEN, and	)	
JOHN DOES 1-100,	)	
	)	
	)	
Defendants.	)	

**STIPULATION BETWEEN JANE DOE AND JIMMIE ALLEN  
AND [PROPOSED] ORDER**

Plaintiff Jane Doe (“Plaintiff”) and Defendant Jimmie Allen (“Allen”) hereby stipulate to the dismissal of Plaintiff’s claims against Jimmie Allen (Counts I, III, IV, V, IX, X in the Verified Complaint [ECF 1]) with prejudice, and the dismissal of Allen’s Counterclaims against Plaintiff [ECF 27] with prejudice. The Court shall retain jurisdiction to enforce the Agreement signed by both parties and effective March 14, 2024.

Notwithstanding, Plaintiff will continue to pursue her claims against Defendants Williams Bowers Management, LLC d/b/a Wide Open Music and Ash Bowers. *See* Verified Complaint, Counts II, VI, VII, VIII, IX, X.

WHEREFORE, Plaintiff and Defendant Jimmie Allen respectfully request that the Court dismiss Plaintiff’s claims against Jimmie Allen (Counts I, III, IV, V, IX, X in the Verified Complaint [ECF 1]) with prejudice, dismiss Allen’s Counterclaims against Plaintiff [ECF 27] with prejudice, and retain jurisdiction to enforce the Agreement signed by both parties and effective March 14, 2024.

It is so **ORDERED**.

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WILLIAM L CAMPBELL, JR.

UNITED STATES DISTRICT JUDGE

Submitted By:

*Counsel for Plaintiff:*

/s/ Elizabeth A. Fegan

Elizabeth A. Fegan (admitted *pro hac vice*)  
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## CERTIFICATE OF SERVICE

I, Elizabeth A. Fegan, an attorney, caused the foregoing to be filed on March 14, 2024 via the Court's electronic filing system which will serve all counsel of record, including:

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Dated: March 14, 2024

By: /s/ Elizabeth A. Fegan